

EXHIBIT 8

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7 **IN THE UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT TACOMA**

10 STATE OF WASHINGTON,
11 DEPARTMENT OF HEALTH,

12 Plaintiff,

13 v.

14 THE GEO GROUP, INC.,

15 Defendant.

16 NO. 3:24-cv-05029

17 DECLARATION OF NIGEL
18 TURNER

19 I, NIGEL TURNER, hereby declare the following:

20 1. I am over the age of 18, competent to testify as to the matters herein, and make this
21 declaration based on my personal knowledge.

22 2. I have served as the Division Director for Communicable Disease Control at the
23 Tacoma-Pierce County Health Department (TPCHD) since 2010. TPCHD is a combined county-
24 city health department that operates pursuant to chapters 70.05 and 70.8 RCW. It is one of 35
25 local health departments and local health districts (serving 39 counties) in Washington.

26 3. TPCHD's mission is to protect and improve the health of all people and places in
Pierce County. The Communicable Disease Control division's principal responsibility is to
prevent and control the spread of diseases in Pierce County. This work includes ensuring food
in restaurants, schools, and other institutions in Pierce County is safe to eat. TPCHD inspects a
number of institutional food establishments including: Pierce County Jail, local Community

Colleges, as well as public and private K-12 schools.

4. At the request of the GEO Group, TPCHD conducts food safety inspections at the Northwest Detention Facility in Tacoma and has done so since 2004. These inspections are conducted under the authority set forth in chapter 246-215 of the Washington Administrative Code (WAC), also known as the Washington State Food Code.

5. When TPCHD staff conducts a food safety inspection at the Northwest Detention Facility, they do not call ahead or make appointments. We require unannounced inspections. When food safety inspectors arrive, they provide their ID to facility staff, sign into a log book, receive a badge to go through the metal detector, their bags are searched, and they receive a UV stamp on their wrist. Facility staff call the Geo Group kitchen manager, who escorts TPCHD staff throughout the facility.

6. To date, TPCHD staff have never been required to undergo a background check by GEO prior to entering the building.

7. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED at Tacoma, Washington, this 19th day of January 2024.



Nigel Turner